

1 Michael J. Gordon (021798)
2 **GORDON & GORDON, P.L.L.C.**
3 850 Cove Parkway, Ste. A
4 Cottonwood, AZ 86326
5 Telephone: (928) 649-8609
6 michael@gordonlawaz.com
7 Attorney for Debtors

8 **IN THE UNITED STATES BANKRUPTCY COURT**
9 **FOR THE DISTRICT OF ARIZONA**

10 In Re:

11 Michael Ervin Warren and Carol Anne
12 Warren,

13 Debtor.

14
15 Wells Fargo Bank, N.A.,

16 Movant,

17 vs.

18
19 Michael Ervin Warren and Carol Anne
20 Warren, Debtors; and Lawrence J.
21 Warfield, Trustee,

22 Respondents.
23

Case No. 2-09-bk-21736-RTBP

Chapter 7

**RESPONSE TO MOTION FOR
RELIEF FROM AUTOMATIC STAY**

Re: Real Property located
at 1726 Saw Mill Rd
Cottonwood, AZ 86326

24 Debtors, by and through undersigned counsel, hereby submit this Response to Motion to
25 Relief from Automatic Stay. Debtors acknowledge that they are behind on their mortgage
26 payment to Movant, but requests that the automatic stay remain in place so as to allow Debtor
27 sufficient time for a possible loan modification with Movant.
28

1 Debtor has begun steps to work with Movant to restructure the terms of the loan.

2 Based on the foregoing, Debtors respectfully requests that Movant's motion be
3 denied.
4

5 DATED this 13th day of October, 2009.

6 GORDON & GORDON, P.L.L.C.

7
8 /s/ Michael J. Gordon
9

10 Michael J. Gordon
11 Attorneys for Debtors

12 Original filed this 13th day
13 of October, 2009 with:

14 United States Bankruptcy Court
15 230 N. First Ave., Ste 204
16 Phoenix, AZ 85003-1706
17

18 Copies of the foregoing
19 were mailed this 13th day
20 of October, 2009 to:

21 Tiffany & Bosco
22 2525 East Camelback Rd, Ste 300
23 Phoenix, AZ 85016
24 Attorneys for Movant

25 Bankruptcy Trustee
26 Lawrence J. Warfield
27 PO Box 14647
28 Scottsdale, AZ 85267

/s/ Michael J. Gordon